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8 *Plaintiffs*

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10 **UNITED STATES DISTRICT COURT**  
11 **NORTHERN DISTRICT OF CALIFORNIA**  
12 **SAN FRANCISCO DIVISION**  
13

14 IN RE: UBER TECHNOLOGIES, INC.,  
15 PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No. 3:23-md-03084-CRB (LJC)

**DECLARATION OF RACHEL ABRAMS  
IN SUPPORT OF PLAINTIFFS' PORTION  
OF THE JOINT LETTER REGARDING  
PEIFFER WOLF PLAINTIFFS' COMPLIANCE  
WITH 11/18 PFS ORDER**

16 This Document Relates to:

17  
18 *Lisa Williams v. Uber Technologies Inc.,*  
*et al.*, No. 3:24-cv-00114

19  
20 *Ashley Carroll v. Uber Technologies Inc.,*  
*et al.*, No. 3:24-cv-02196

21  
22 *T.R. v. Uber Technologies Inc., et al.*,  
No. 3:24-cv-03592

23  
24 *H.L. v. Uber Technologies Inc., et al.*,  
No. 3:24-cv-04526

25  
26 *L.M. v. Uber Technologies Inc., et al.*,  
No. 3:24-cv-05179

27  
28 *A.T. v. Uber Technologies Inc., et al.*,  
No. 3:24-cv-05592

*A.H. v. Uber Technologies Inc., et al.*,  
No. 3:24-cv-05807

Judge: Hon. Lisa J. Cisneros  
Courtroom: G – 15th Floor



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**DECLARATION OF RACHEL ABRAMS**

I, Rachel Abrams, declare pursuant to 28 U.S.C. § 1746:

1. I am a partner of Peiffer Wolf Care Kane Conway & Wise (“Peiffer Wolf”), an attorney licensed in the State of California and duly admitted to practice before this Court, representing Plaintiffs in the above caption action.

2. I submit this declaration in support of Plaintiffs’ portion of the joint letter brief concerning Peiffer Wolf Plaintiffs (“Plaintiffs”) compliance with the November 18, 2024 Order issued by this Court (“Order”).

3. I have personal knowledge of the facts stated herein and, if called upon to do so, could and would testify competently thereto.

4. As required by PTO 8, I attest that Plaintiffs met and conferred with Defendants prior to seeking relief from the Court.

5. On December 2, 2024, counsel for Plaintiffs, anticipating the time-consuming and taxing nature of getting more than 140 Plaintiffs in compliance with the Order within 30 days, first requested an extension of the Order’s deadline by which to cure PFS productions.

6. On December 3, 2024, Uber responded that it required detailed information as to how many and which Plaintiffs requested an extension by which to cure PFS productions.

7. On December 4, 2024, counsel for Plaintiffs sent a letter identifying 127 Plaintiff that still needed to produce compliant PFS and verifications and reiterating the request for extension of the Order’s deadline to do same.

8. Uber waited until December 11, 2024 to respond to counsel for Plaintiffs’ repeated requests for extension. Exhibit B to the Declaration of Kyle Smith is a true and correct copy of the letter Uber sent Peiffer Wolf on December 11, 2024 (“Letter”). That letter identified 142 Plaintiff which needed amended PFS productions.

9. In the Letter, Uber denied Plaintiffs’ request for extension as to 14 Plaintiffs, and granted the remaining 128 Plaintiffs until January 18, 2024 to comply with the Order.



1           10. On December 18, 2024, Plaintiffs sent a letter informing Uber that eight (8) of the  
2 14 PFS productions due that day were cured. The parties met and conferred about the remaining  
3 Plaintiffs on December 23, 2024, and again on January 7, 2025, by which time only five (5) of  
4 the 14 overdue PFS productions remained at issue.

5           11. In the meantime, counsel for Plaintiffs agreed to withdraw from two cases, and  
6 informed Uber of a recently deceased Plaintiff. As to the remaining 14 Plaintiffs which were due  
7 by December 18, 2024, counsel for Plaintiffs either cured the deficiencies or provided reasonable  
8 explanations as to why more time was necessary to cure the deficiencies.

9           12. On January 8, 2025, Uber decided not to submit the five (5) overdue cases to a  
10 PTO 8 dispute for the Court to resolve.

11           13. Between the Order and January 24, 2025, counsel for Plaintiffs had cured more  
12 than 100 PFS productions in compliance with the Order.

13           14. On January 25, 2025, Uber sent counsel for Plaintiffs a chart listing 31 Plaintiffs  
14 that were still non-compliant with the Order.

15           15. On January 29, 2025, the parties met and conferred again about the 31 Plaintiffs  
16 listed in the January 25, 2025 chart.

17           16. Between January 25, and January 29, 2025, the list of 31 Plaintiffs had been  
18 reduced to 15 non-compliant Plaintiffs.

19           17. During the January 29, 2025 meeting between the parties, Uber informed  
20 Plaintiffs that it was submitting the remaining non-compliant Plaintiffs to a PTO 8 dispute before  
21 this Court. Counsel for Plaintiffs withdrew from two (2) additional cases during that time.

22           18. On February 4, 2025, Uber sent its portion of the present PTO 8 dispute letter and  
23 attached a list of the remaining Plaintiffs that were still not in compliance with the Order. That  
24 list consists of eight (8) Plaintiffs. That list of eight (8) Plaintiffs went down to seven (7) during  
25 the briefing process related to this PTO 8 dispute, and Uber is now submitting a list of seven (7)  
26 non-compliant cases to the Court.







# EXHIBIT A



<b>Plaintiff</b>	<b>Date Complaint Was Filed</b>	<b>Non-Compliance with November 18, 2024 Order</b>	<b>Date Plaintiff Last Submitted a Signed Verification</b>
Joshua Cormier, No. 3:23-cv-04745, MDLC ID 1036	9/15/2023	Required to Supplement Answer to Question 40.a	1/16/2025
Jillian Sullivan, No. 3:23-cv-05418, MDLC ID 1089	5/2/2023	Unverified Third Amended PFS	12/11/2024
X.Y., No. 3:23-cv-05679, MDLC ID 1074	11/3/2023	Unverified Second Amended PFS	5/13/2024
Jane Doe LS 56, No. 3:23-cv-05943, MDLC ID 1200	11/16/2023	Unverified Original PFS; Required to Provide Third-Party Contact Information in Response to Question 30.a; Required to Supplement Answers to Questions 7 and 30.a	N/A
Lisa Williams, No. 3:24-cv-00114, MDLC ID 1048	1/5/2024	Unverified Original PFS; Required to Provide Third-Party Contact Information in Response to Question 30.a; Required to Supplement Answer to Question 40.a	N/A
K.S., No. 3:24-cv-01157, MDLC ID 1285	2/26/2024	Required to Provide Third-Party Contact Information in Response to Question 30.a	5/22/2024
Camilla Harris, No. 3:24-cv-01159, MDLC ID 1286	2/26/2024	Unverified Amended PFS	5/22/2024



N.A., No. 3:24-cv-01520, MDLC ID 1291	3/12/2024	Unverified Amended PFS; Required to Provide Third-Party Contact Information in Response to Question 30.a	5/6/2024
Ashley Carroll, No. 3:24-cv-02196, MDLC ID 1314	4/12/2024	Unverified Amended PFS	5/10/2024
Brianna Smith, No. 3:24-cv-02707, MDLC ID 1329	5/7/2024	Unverified Second Amended PFS	8/7/2024
A.J., No. 3:24-cv-03240, MDLC ID 1381	5/30/2024	Required to Supplement Answers to Questions 11, 13.a, 13.c, and 14.a	7/1/2024
T.R., No. 3:24-cv-03592, MDLC ID 1388	6/14/2024	Unverified Amended PFS	7/2/2024
Katerina Fedoseeva, No. 3:24-cv-03602, MDLC ID 1387	6/14/2024	Unverified Third Amended PFS	8/20/2024
M.C., No. 3:24-cv-03608, MDLC ID 1389	5/24/2024	Unverified Second Amended PFS; Required to Provide Third-Party Contact Information in Response to Question 30.a	7/24/2024
Angelita Diaz, No. 3:24-cv-04237, MDLC ID 1463	7/15/2024	Unverified Second Amended PFS	8/15/2024
Y.G., No. 3:24-cv-04441, MDLC ID 1464	7/23/2024	Unverified Second Amended PFS	7/25/2024
H.L., No. 3:24-cv-04526, MDLC ID 2149	7/26/2024	Unverified Amended PFS	N/A



L.M., No. 3:24-cv-05179, MDLC ID 2249	8/15/2024	Unverified Amended PFS	N/A
C.M., No. 3:24-cv-05182, MDLC ID 1741	8/15/2024	Required to Provide Third-Party Contact Information in Response to Question 30.a	8/15/2024
A.B., No. 3:24-cv-05282, MDLC ID 2142	8/16/2024	Unverified Amended PFS	10/2/2024
R.B., No. 3:24-cv-05290, MDLC ID 2137	8/16/2024	Unverified Second Amended PFS	N/A
Javante Brown, No. 3:24-cv-05296, MDLC ID 2228	8/16/2024	Unverified Second Amended PFS	8/28/2024
H.M., No. 3:24-cv-05301, MDLC ID 1851	8/16/2024	Required to Provide Third-Party Contact Information in Response to Question 30.a	8/20/2024
L.R., No. 3:24-cv-05435, MDLC ID 2237	8/20/2024	Unverified Amended PFS	10/11/2024
A.T., No. 3:24-cv-05592, MDLC ID 1927	8/21/2024	Unverified Original PFS; Required to Provide Third-Party Contact Information in Response to Question 30.a; Required to Supplement Answer to Question 7	N/A
D.M.S., No. 3:24- cv-05606, MDLC ID 1930	8/21/2024	Unverified Amended PFS	N/A
M.P., No. 3:24-cv-05623, MDLC ID 1946	8/21/2024	Unverified Amended PFS	8/23/2024



K.B., No. 3:24-cv-05719, MDLC ID 2246	8/22/2024	Unverified Original PFS; Required to Supplement Answer to Question 7	N/A
A.H., No. 3:24-cv-05807, MDLC ID 2144	8/23/2024	Unverified Amended PFS	N/A
Cody Jones, No. 3:24-cv- 05822, MDLC ID 2200	8/23/2024	Unverified Amended PFS	N/A
T.S., No. 3:24-cv-07277, MDLC ID 2628	10/18/2024	Required to Supplement Answer to Question 7	1/17/2025



# EXHIBIT B



<b>Plaintiff</b>	<b>Date Complaint Was Filed</b>	<b>Non-Compliance with November 18, 2024 Order</b>	<b>Date Plaintiff Last Submitted a Signed Verification</b>
Lisa Williams, No. 3:24-cv-00114, MDLC ID 1048	1/5/2024	Unverified Second Amended PFS	N/A
K.S., No. 3:24-cv-01157, MDLC ID 1285	2/26/2024	Unverified Amended PFS	5/22/2024
Ashley Carroll, No. 3:24-cv-02196, MDLC ID 1314	4/12/2024	Unverified Amended PFS	5/10/2024
T.R., No. 3:24-cv-03592, MDLC ID 1388	6/14/2024	Unverified Amended PFS	7/2/2024
Katerina Fedoseeva, No. 3:24-cv-03602, MDLC ID 1387	6/14/2024	Unverified Fourth Amended PFS	8/20/2024
Angelita Diaz, No. 3:24-cv-04237, MDLC ID 1463	7/15/2024	Unverified Second Amended PFS	8/15/2024
H.L., No. 3:24-cv-04526, MDLC ID 2149	7/26/2024	Unverified Amended PFS	N/A
L.M., No. 3:24-cv-05179, MDLC ID 2249	8/15/2024	Unverified Amended PFS	N/A
H.M., No. 3:24-cv-05301, MDLC ID 1851	8/16/2024	Required to Provide Third-Party Contact Information in Response to Question 30.a	8/20/2024



A.T., No. 3:24-cv-05592, MDLC ID 1927	8/21/2024	Unverified Original PFS; Required to Provide Third- Party Contact Information in Response to Question 30.a; Required to Supplement Answer to Question 7	N/A
D.M.S., No. 3:24- cv- 05606, MDLC ID 1930	8/21/2024	Unverified Amended PFS	N/A
M.P., No. 3:24-cv-05623, MDLC ID 1946	8/21/2024	Unverified Amended PFS	8/23/2024
K.B., No. 3:24-cv-05719, MDLC ID 2246	8/22/2024	Unverified Original PFS; Required to Supplement Answer to Question 7	N/A
A.H., No. 3:24-cv-05807, MDLC ID 2144	8/23/2024	Unverified Amended PFS	N/A
Cody Jones, No. 3:24-cv- 05822, MDLC ID 2200	8/23/2024	Unverified Amended PFS	N/A